

Will the broadcast flag interfere with consumers ability to make copies of DTV content for their personal use, either on personal video recorders or removable media?

Yes, in my opinion, the broadcast flag proposal will present an undue burden on normal uses of personal video recorders and similar devices. Further, it will provide no impediment whatsoever to professional pirates.

Would the digital flag interfere with consumers ability to send DTV content across networks, such as home digital networks connecting digital set top boxes, digital recorders, digital servers and digital display devices?

Yes, the digital flag will make it essentially impossible for technically naive consumers to make full use of modern technology. The proponents of the broadcast flag are simply dissembling when they assert otherwise.

Would the broadcast flag requirement limit consumers ability to use their existing electronic equipment (equipment not built to look for the flag) or make it difficult to use older components with new equipment that is compliant with the broadcast flag standard?

As proposed, the broadcast flag requirement would put some difficulties in the way of using existing equipment, but the more serious issue for the technology world is that it would produce a major disincentive to upgrade equipment to new (and hopefully better) standards.

Would a broadcast flag requirement limit the development of future equipment providing consumers with new options?

This is the most serious issue. I believe that it would produce such a serious burden on the development of new equipment that not only would the entertainment industry be impacted but the entire digital world of the future.

What will be the cost impact, if any, that a broadcast flag requirement would have on consumer electronics equipment?

The cost impact will not primarily be that of components, but rather in the costs of complying with new and stringent regulation. Fewer companies would be willing to compete and this would produce higher prices, fewer options, and in general present a major drag on the economy.

Other Comments:

It is my opinion that the entire thrust of digital rights management, broadcast flags, and similar proposals is seriously misguided. As an engineer (PhD in EE, 1963) and a longtime member of the SMPTE, I have observed that entrenched interest much prefer to bar technological change than to change themselves to accommodate new technology.